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May 14, 2015

VIA ECF

The Honorable Sarah Netburn
United States Magistrate Judge
40 Foley Square
New York, NY 10007

Re: *Doncouse v. American Apparel Retail, Inc., et al.*
Case No. 14-CV-9986 (PGG) (SN)

Dear Judge Netburn:

We represent American Apparel Retail, Inc. with respect to the above-referenced matter. We write on behalf of all parties to request an extension of time to file settlement letters in advance of the settlement conference scheduled for May 21, 2015 at 2:00 PM. The settlement letters are currently due today.

The parties have moved substantially closer to resolving this matter without intervention of the Court in the past two days, including having exchanged a draft agreement with many of the material terms agreed to. The parties believe that the increased attorneys' fees that would be incurred in drafting settlement letters to the Court may upset the negotiation process. Accordingly, the parties respectfully request an extension until May 20, 2015 to either: (i) resolve the matter and cancel the settlement conference; or (ii) submit settlement letters before appearing before the Court the following day.

We appreciate the burden this request imposes on the Court in preparing for the conference and the uncertainty it injects into the Court's schedule, and apologize for the same. However, the parties are hopeful that this matter will be brought to a close without the assistance of the Court.

Thank you for Your Honor's attention to this issue. Should the Court have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Brian D. Murphy

Brian D. Murphy
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: All Counsel of Record (via ECF)